

Bayway Refinery P.O. Box 222 1400 Park Avenue Linden, New Jersey 07035

Certified Mail - RRR 7005 1140 0003 9477 5800

February 9, 2011

US Environmental Protection Agency
Ariel Rios Building
Mail Code 2254A
1200 Pennsylvania Avenue, NW,
Washington, DC 20460
Attn: Robert G. Heiss, Director
International Compliance Assurance Division

2010 Annual Export Report NJD 986 645 984

Dear Mr. Heiss:

As required by Section 3017 of the Resource Conservation and Recovery Act and under Federal regulations 40 CFR Sections 262.56 and 262.87(a), I submit the "Annual Report of Hazardous Waste Exports for 2010" and waste minimization statements for the ConocoPhillips owned and operated Bayway Refinery. The refinery is located at 1400 Park Avenue, Linden, New Jersey 07036.

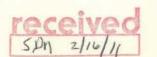
Contact me at (908) 523-5732 if you need additional information.

Sincerely,

Hans Sidler

Waste Compliance Engineer

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Bayway Refinery P.O. Box 222 1400 Park Avenue Linden, NJ 07036



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ConocoPhillips

First Class Mail

Robert G. Heiss, Director USEPA Int'l Compli. Assur. Div. Mail Code 2254A 1200 Pennsylvania Avenue, NW Washington DC 20460 Switt

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To: Heiss,Robert

Mailstop: 2254A

Department: OFA

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1.	PRIMARY EXPORTER (Con	AND CONTRACTOR OF THE PROPERTY				
	Name:		os Company / Bayway Refinery			
	EPA ID No.	NJD 986645984	<u> </u>			
	Mailing Address:	P.O. Box 222				
	City:	Linden	State: New Jersey Zip: 07036			
2.	CONSIGNEE					
		ABLEX Canada, Inc				
		Industrial Blvd				
	100 TO THE TOTAL THE TOTAL TO T	ainville, Quebec				
		980756415				
3.	TRANSPORTER No. 1:	Name:	Freehold Cartage Inc.			
٥.	IMMSFORTER NO. 1.	EPA ID No.:	NJD 054126164			
		TOTAL SERVICE CONTROL OF				
	TRANSPORTER No. 2:	Name: _ EPA ID No.:	Transport Rollex Limitee NYF 006000053			
		EPA ID NO.:	NIF 000000033			
	TRANSPORTER No. 3:	Name:				
		EPA ID No.:				
4.	WASTE INFORMATION					
	Description of Waste	Spent	Sandblast Abrasives			
	EPA Waste Numbers:		D008			
	DOT Proper Shippin	g Name: RQ Wast	Environmentally Hazardous Substance,			
		Solid,	n.o.s.,(D008), III,			
	DOT Hazard Class:	9	DOT ID Code (UN/NA): UN 3077			
5.	SHIPPING INFORMATION					
	Number of Shipment Total Volume of th		endar Year: 3 33.75 tons			
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6.	WASTE MINIMIZATION S	PATEMENT	= 67500 P			
0.	10					
	Not Required (See Instructions)					
	Submitted w	ith EPA Biennial	Report			
	x Attached					
7.	CERTIFICATION					
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the	information, I believe	that the submitt	ed information is true, accurate, and			
7	lete. I am aware that rmation including the		icant penalties for submitting false ne and imprisonment.			
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	4					
Sign	ad AL ES		Date: 2/0/2011			

1.	PRIMARY EXPORTER (Cor	nsignor)	
			Company / Bayway Refinery
	EPA ID No.	NJD 986645984	
	Mailing Address:	P.O. Box 222	
	City:	Linden	State: New Jersey Zip: 07036
2.	CONSIGNEE		
	Name: STA	ABLEX Canada, Inc.	
	PULL DATE THE STATE OF THE STAT	Industrial Blvd.	The state of the s
	EPA ID No.: NYI	ainville, Quebec Car D 980756415	nada 07C3V4
3.	TRANSPORTER No. 1:		Transport Rollex Limitee NYF 006000053
	TRANSPORTER No. 2:	Name:	
		EPA ID No.:	SCHOOL SCHOOLS IN THE SCHOOL S
4.	WASTE INFORMATION		
	Description of Waste:	Lead Acid	d Batteries
	EPA Waste Numbers:	D0	02, D008
	DOT Proper Shipping	g Name: RQ Waste B. PG III	atteries, Wet, Filled with Acid,
	DOT Hazard Class:	8	DOT ID Code (UN/NA): UN 2794
5.	SHIPPING INFORMATION		
	Number of Shipment: Total Volume of th	s during the Calendis Waste Shipped:	ar Year: 3 2.02 tons
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Name	of Responsible Officia	al: Hans Sidler Tit	le: Waste Compliance Engineer
Signe	ed: Mal	~	Date: 2/4/2011

1.	PRIMARY EXPORTER (C Name:		Dhilling Co		Bayway Refinery	
	EPA ID No.	NJD 98		mpany /	bayway Kelinery	V2
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	City:	Linden		State:	New Jersey Zip:	07036
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2.		TABLEX Cana				
		60 Industri	The state of the s			
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	EPA ID No.: N	YD 98075641	.5			
3.	TRANSPORTER No. 1:	Name:		Transpo	rt Rollex Limit	tee
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4.	WASTE INFORMATION					
3₹#.	Description of Wast	e:	Mixed Batt	eries		
	2	74				
	EPA Waste Numbers	:	D00)3, D006,	D011, D008	
	DOT Proper Shippi	ng Name: F	RO Waste Bat	teries.	Dry, Containing	r Potassin
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	DOT Hazard Class:	8	3	DOT ID	Code (UN/NA):	<u>UN3028</u>
5.	SHIPPING INFORMATION	И				
	Number of Shipmen	ts during t	the Calendar	Year.	3	
	Total Volume of t			. rour.	0.45 tons	
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5.	WASTE MINIMIZATION	STATEMENT				
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1.	PRIMARY EXPORTER (Name:		coDbilling (Commence	/ Darwery Dafinson	
	EPA ID No.		986645984	Company /	Bayway Refiner	У
	Mailing Address:	P.O.				
	City:	Lind		State:	New Jersey Zip	: 07036
2.	CONSIGNEE					
		STABLEX Ca	nada, Inc.			
			rial Blvd.			
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		NYD 980756				
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٥.	TRANSPORTER No. 1:	Name: EPA II		NYF 00	ort Rollex Limi	tee
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	TRANSPORTER No. 2:	7 H Pa 25H Z And Har 10 AND 14				
		EPA II) No.:			
4.	WASTE INFORMATION					
	Description of Was	te:	Catalyst	(Zinc Ox	ide)	
						
	EPA Waste Number	s:	K	171		
	DOT Droper Chipp	ing Name.	Woote Frank		las Hannadaya Co	
	DOT Proper Shipp	ing Name:	1,000,000,000	THE RESIDENCE OF THE PERSON OF	RQ-1 (K171)	ostance,
			11.0.3., (11.1	111, 111,	1/2-1 (1/1/1)	7.
	DOT Hazard Class	:	9	DOT ID	Code (UN/NA):	UN3077
		W				
5.	SHIPPING INFORMATI	ON				
15.00 15.00		2.71				
	Number of Shipme	nts during	the Calenda	ar Year:	1	
	Total Volume of	this Waste	Shipped:		3.90 tons	
					012 1	
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6.	WASTE MINIMIZATION	STATEMENT				
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1.	PRIMARY EXPORTER (Co		1: 0 /	20.44			
	Name:			Bayway Refiner	У		
	EPA ID No.	NJD 986645					
		P.O. Box 2					
	City:	Linden	State:	New Jersey Zip	: 07036		
2.	CONSIGNEE						
		TABLEX Canada,	Inc				
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3.	TRANSPORTER No. 1:	Name:		Rollex Limitee			
		EPA ID No.:	NYF 00	6000053			
	TRANSPORTER No. 2:	Name:					
		EPA ID No.:	***************************************				
4.	WASTE INFORMATION						
	Description of Waste	e:	Abrasives an	d Paint Chips			
	EPA Waste Numbers	:	D008, D007				
	DOT Proper Shippi	TOTAL CONTRACTOR OF THE PARTY O	The state of the s	tally Hazardous	Substance		
		Solid	, n.o.s., (D008	, D007), III,			
	DOT Hazard Class:	99	DOT ID	Code (UN/NA):	_UN 3077		
5.	SHIPPING INFORMATION						
	Number of Shipmen	to during the C	alandar Vaar.	1			
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7.	CERTIFICATION						
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with	the information submi	itted in this ar	nd all attache	d documents, and	d that		
base	d on my inquiry of the	ose individuals	immediately r	esponsible for d	obtaining		
the	information, I believe	that the subma	itted informat	ion is true, acc	curate, and		
comp	lete. I am aware that	there are sign	nificant penal	ties for submitt	ting false		
info	rmation including the	possibility of	fine and impr	isonment.			
Name	of Responsible Offici	ial: Hans Sidle	Title: Wast	e Compliance Eng	gineer		
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Waste Minimization Statement for Hazardous Characteristic Contaminated Spent Sandblast Abrasives

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

The Bayway Refinery utilizes crude petroleum as feed stock to produce a complete line of fuel products as well as petrochemical feed stocks and specialty products. The facility does not purchase or produce lead or other hazardous characteristic containing products. The Bayway Refinery uses only environmentally friendly, non-lead based coatings on new and repaired equipment.

As part of the operations of the refinery, rust, scale and paint are removed from transfer lines, storage tanks and process equipment by sand blasting with abrasives in order to prepare surfaces for metal inspection, welding or repainting. Employees have been informed of the potential for lead based coatings at the refinery. They are trained to test dry paints and primers prior to removal and to segregate contaminated media from each job site regardless of generated volume.

Old protective coatings slated for removal are tested by analysis and/or lead stick for lead content. Rather than using a dry sandblast technique, lead based paint from transfer lines, storage tanks and process equipment in difficult to access areas is removed by scraping or by high pressure water and wet garnet blasting, whenever feasible.

Paint removal from tanks is accomplished by either pressure washing, or by utilizing the "Versa Blast" vertical blast cleaning system. The system cleans vertical surfaces by using steel split shot and a very small amount of grit as the blast cleaning media. A hoist system, which is mounted on a fixture at the top of the tank being cleaned, raises and lowers the blast module as the module moves along the surface horizontally. The system is capable of providing white metal finishes.

The horizontal speed, vertical speed, shot flow rate, and fixture movement are adjusted by remote control. The abrasive media are contained, circulated, and cleaned within the blast module. A cyclone separator on the ground separates the steel split shot from the media for re-use and deposits the paint and dust into plastic lined 55-gallon drums. The process reduces the volume of generated lead contaminated hazardous abrasives by up to 95%.

The Bayway Refinery has considered several waste management method alternatives. On-site remediation or fixation of the lead constituent contained in the waste is not feasible because of cost and the lack of treatment permits. Treatment of the low BTU waste by incineration does not reduce the lead hazard and would result in impermissible dilution of the lead component in the incinerator ash.

This minimization statement pertains to shipments of Hazardous Characteristic Contaminated Spent Sandblast Abrasives on pages 1 and 5 of the annual report.

Waste Minimization Statement for Spent Lead Acid Batteries

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

The Bayway Refinery has approximately 100 substations which distribute electric power to the various process units. Energy for the substation switchgear and control panels is provided by twelve to sixty lead acid batteries per station. These batteries are periodically replaced to ensure a reliable and uninterrupted electric power supply to the refinery.

The Bayway Refinery is taking source reduction action to reduce the volume of generated used lead acid batteries from substations by choosing high-grade replacement batteries that have an estimated useful service life of more than twenty years. When the refinery purchases automotive lead acid batteries for its fleet of cars, trucks and heavy equipment, an equivalent number of spent automotive batteries is returned to the supplier for recycling.

The Bayway Refinery has considered several waste management method alternatives for lead acid batteries from substations. Shipping these batteries for metal reclamation to a lead smelter in Missouri is deemed unacceptable because of potential future environmental liability concerns. State and Federal agencies have determined that many residential properties in the vicinity of the Missouri plant have been contaminated by lead emissions from the smelting operation. The facility has also received many citations and fines.

In the absence of an alternate and readily available lead smelting facility which is protective to human health and the environment, the Bayway Refinery believes that the present method of shipping the batteries to a competent and experienced waste management service provider for treatment and disposal to be an environmentally sound option.

This minimization statement pertains to shipments of Spent Lead Acid Batteries on page 2 of the annual report.

Waste Minimization Statement for Mixed Batteries

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

Bayway Refinery employees and contractors use a variety of equipment and tools that are powered by batteries, including alkaline, silver oxide, lithium, nickel/metal hydride and various other types. Spent batteries are collected and placed into satellite accumulation containers.

The Bayway Refinery has considered sorting the batteries by type in order to make them amenable to metal reclamation. Spent batteries come in all shapes and sizes and vary in length from a fraction of an inch to several inches each. Experience has shown that sorting of those batteries by type to render them acceptable for metal reclamation is tedious, time consuming and subject to human error. Sorting and subsequent transportation of the small volume of generated batteries to various facilities is not cost-effective.

The Bayway Refinery believes that the proper treatment and disposal of a limited volume mixed batteries by a competent and experienced waste management service provider is protective to human health and the environment and constitutes currently the most economically practicable waste management option available to us.

This minimization statement pertains to shipments of Mixed Batteries on pages 3 of the annual report.

Waste Minimization Statement for Spent listed Hazardous K171 Catalyst

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

The Bayway Refinery utilizes crude petroleum as a feed stock to produce a complete line of fuel products as well as petrochemical feed stocks and specialty products. As part of the operations of the refinery, a sulfur guard bed at the Hydrogen Process Unit was placed into service to remove trace amounts of sulfur contaminants from natural gas feedstock. The sulfur contaminants are removed by contacting the product with a Zinc oxide catalyst (ZnO).

Over time, the sulfur removal efficiency of the ZnO oxide catalyst decreases. The reactor is taken off-line and isolated. The spent catalyst is cooled to ambient temperatures and placed into 55-gallon capacity drums. Representative samples are taken and submitted to a State certified third-party contract laboratory for the analysis of waste classification parameters.

The Bayway Refinery has carefully evaluated a number of other catalysts to effect the removal of trace level sulfur contaminants from natural gas feedstock. The ZnO replacement catalyst was chosen because it is more reactive with sulfur and is capable of higher sulfur loading. Since ZnO catalyst requires less frequent catalyst change-outs, lesser volumes of spent catalyst will be generated. Strict adherence to detailed catalyst deactivation and change-out procedures reduces toxicity.

The Bayway Refinery has considered several waste management method alternatives for the spent ZnO catalyst. Off-site thermal treatment is not cost-effective and provides minimal environmental benefit since the sum of all organic constituents in the spent ZnO catalyst comprises less than 0.05 percent of the total spent catalyst volume. Furthermore, treatment of the spent ZnO catalyst by incineration does not reduce the arsenic hazard and would result in impermissible dilution of the arsenic component in the incinerator ash.

The Bayway Refinery has contacted several domestic metal reclamation facilities. Most of the plants determined that spent ZnO catalyst is not compatible with their metal reclamation process. Facilities that could have processed the catalyst lacked RCRA hazardous waste permits. The Bayway Refinery believes that Stablex, with its considerable expertise in the chemical treatment and fixation of inorganic waste constituents, is currently the best available option for the environmentally sound disposition of deactivated spent ZnO catalyst.

This minimization statement pertains to shipments of Catalyst Desiccant on page 4 of the annual report.

Waste Minimization Statement for Lead Contaminated Abrasives and Paint Chips

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

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The Bayway Refinery has considered several waste management method alternatives. On-site remediation or fixation of the lead constituent contained in the waste is not feasible because of cost and the lack of treatment permits. Treatment of the low BTU waste by incineration does not reduce the lead hazard and would result in impermissible dilution of the lead component in the incinerator ash.

This minimization statement pertains to shipments of Lead Contaminated Paint Chips on page 5 of the annual report